

Bruce Berline, Esq.  
Law Office of Bruce Berline LLC  
Security Title Building  
Isa Drive, Capitol Hill  
P.O. Box 5682  
Saipan, MP 96950  
Telephone: (670) 233-3663  
Facsimile: (670) 233-5262  
Email: bberline@gmail.com

Aaron Halegua  
AARON HALEGUA, PLLC  
524 Broadway, 11th Floor  
New York, New York 10012  
Tel: (646) 854-9061  
Email: ah@aaronhalegua.com

Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN MARIANA ISLANDS**

JOSHUA GRAY,

Case No. 19-cv-0008

**Plaintiff,**

**PLAINTIFF'S PETITION FOR AN  
ORDER TO SHOW CAUSE  
AGAINST IPI AND HOWYO CHI**

**IMPERIAL PACIFIC INTERNATIONAL  
(CNMI), LLC,**

Hearing date: n/a  
Hearing time: n/a  
Judge: Hon. Ramona V. Manglona

**Defendant:**

On October 23, 2023, the Court issued an Order directing that Defendant Imperial Pacific International (CNMI), LLC (“IPI”) “shall ensure and fund the security of IPI’s Personal Property until it is sold by the Limited Receiver and delivered to the buyer. Within fourteen (14) days of the filing of the inventory list by the Receiver, IPI shall file with the Court a sworn declaration and supporting evidence demonstrating its compliance with this provision.” (ECF No. 275 (the “Order”)  
¶ 16). Based on IPI’s failure to comply with this Order, Plaintiff Joshua Gray hereby petitions the

Court to issue an Order to Show Cause why the Court should not enter an order: (i) holding IPI in contempt; (ii) holding IPI's executive director, Howyo Chi, in contempt; (iii) directing IPI to compensate Plaintiff for the liquor stolen from the Casino; (iv) imposing a daily fine of \$10,000 until IPI complies, and incarcerating Mr. Chi if IPI's noncompliance persists; and (v) directing IPI to pay Plaintiff's reasonable attorneys' fees and costs resulting from its disobedience. Plaintiff's petition is supported by a Memorandum of Law, the Declaration of Aaron Halegua, dated April 7, 2024, and the Declaration of Christopher Craney, dated April 8, 2024, and all exhibits attached thereto.

Respectfully submitted,

/s/  
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Aaron Halegua  
Bruce Berline

Attorneys for Plaintiff